

United States District Court FILED

MIDDLE

DISTRICT OF

ALABAMA

MAR 17 2006

UNITED STATES OF AMERICA

v.

CRYSTAL DENISE PHILLIPS

CRIMINAL COMPLAINT CLERK
U. S. DISTRICT COURT
MIDDLE DIST. OF ALA.

CASE NUMBER:

2:06mj32-B

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about Dec. 19, 2005, in Autauga county, in the Middle District of Alabama defendant(s) did, (Track Statutory Language of Offense)

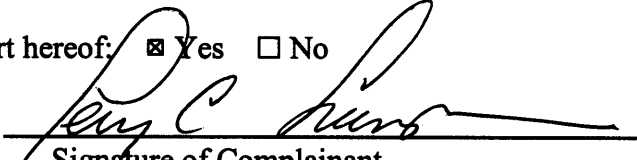
embezzle, steal, purloin, and knowingly convert to her use or the use of another money or a thing of value of the United States and any department or agency thereof to wit: \$2,000.00 assorted U.S. currency

in violation of Title 18 United States Code, Section(s) 641

I further state that I am an Assistant Special Agent in Charge of the Dept. of Homeland Security and that this complaint is based on the following facts: Official Title

See attached Affidavit

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


Signature of Complainant

Sworn to before me and subscribed in my presence,

March 17, 2006 at Montgomery, Alabama
Date City and State

DELORES R. BOYD, U.S. MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

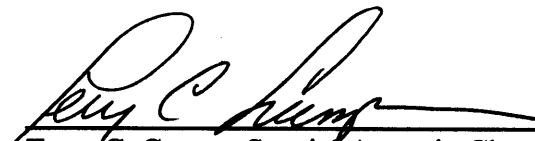
AFFIDAVIT

I, Terry C. Crump, being duly sworn, depose and state the following:

1. I am an Assistant Special Agent in Charge (ASAC) of the Department of Homeland Security (DHS), Office of Inspector General (OIG), Office of Investigations, assigned to investigate violations of Title 18, United States Code and other violations against DHS. I have 21 years of criminal investigative experience with the federal government.
2. This affidavit is made in support of an application for a criminal complaint and an arrest warrant for Crystal D. Phillips, for violation of Title 18, United States Code (USC), Section 641-*Theft of Government Property/Funds*.
3. On August 29, 2005, following the landfall of Hurricane Katrina, President George W. Bush declared several counties in the State of Louisiana federal disaster areas (FEMA-1603-DR-LA), making qualified applicants eligible for Individual Assistance (IA) and Public Assistance (PA) disaster funds. The DHS, Federal Emergency Management Agency (FEMA) established a toll-free telephone number and an Internet web-based registration site for individuals to make applications for disaster assistance funds under their housing assistance program. Because of the catastrophic emergency situation, FEMA expedited payment of \$2000.00 in funds without immediate verification of the authenticity by an inspector of the individual claims. These funds are intended to provide emergency compensation for emergency housing, shelter or food needs to those applicants displaced by the disaster. FEMA will also arrange with the applicant a future date for an inspector to visit and assess any further housing and other disaster assistance funding needs.
4. On or about September 21, 2005, FEMA received a telephonic registration, registration id number 93-1303801, for Crystal Phillip, for FEMA disaster number 1603- Louisiana Hurricane. The damaged address was 819 Whitney Avn., Harvey, LA 70058, and the current mailing address was 933 Hill Street, Montgomery, AL 36108. Based on this application, FEMA caused a U.S. Treasury check (the "First Check") in the amount of \$2,000 to be mailed to Crystal Phillip at 933 Hill Street.
5. On or about September 24, 2005, Detective John Hall, Montgomery (Alabama) Police Department was notified by employees of the Cash Connection, 2513 Madison Avenue, Montgomery, AL, that Crystal Phillips attempted to cash the First Check. When employees asked Crystal Phillips about the check she left the store leaving behind the FEMA check and a State of Alabama (Nondriver) Identification card, number I638697, issued on January 31, 2005, to Crystal Denise Phillips, 932 Goodwyn Circle, Apt. C, Montgomery, AL 36108.

6. On or about September 25, 2005, FEMA received a telephone registration, registration id number 91-2187180, for Crystal Phillips, for FEMA disaster number 1603- Louisiana Hurricane. The damaged address was 810 Whitney Avn., Harvey, LA 70058, and the current mailing address was 932 Goodwyn Dr, Apt D, Montgomery, AL 36108.
7. On October 11, 2005, Special Agents Terry Crump and Jeffery Monnin interviewed Crystal Phillips regarding an allegation that she filed a false FEMA claim for disaster assistance. Phillips admitted that another person filed a FEMA claim on Phillips' behalf and that Phillips received a FEMA check and attempted to cash it at the check cashing store. During the interview, Phillips told Special Agents Crump and Monnin that her address was 932 Goodwyn Dr., Apartment C, Montgomery, AL 36108. Montgomery Housing Authority records show that Phillips had been living at that address since January 8, 2004.
8. On November 15, 2005, a federal grand jury in Montgomery returned an indictment against Phillips charging one count of mail fraud in connection with the First Check, Case No. 2:05CR268-A. On November 21, 2005, Phillips had her initial appearance and arraignment; she was released on an unsecured bond.
9. On or about December 12, 2005, as a result of the FEMA claim, number 91-2187180, dated September 25, 2005, FEMA scheduled a disbursement of \$2,000.00, disbursement number 75283094. As a result of the scheduled disbursement, a U.S. Treasury check, number 2221 75283094, dated December 13, 2005 (the "Second Check"), was mailed to Crystal Phillips, 932 Goodwyn Dr, Apt D, Montgomery, AL 36108.
10. On or about December 19, 2005, the Second Check was negotiated at Wal-Mart #0483, Prattville, AL. The back of the check was endorsed with the name Crystal Phillips. On the front of the check was written "A1-I638697".
11. On March 16, 2006, Special Agent Terry Crump conducted a query of the Alabama Law Enforcement Tactical System (LETS), which disclosed that a State of Alabama Identification Card Number I638697, was issued on September 30, 2005, to Crystal Denise Phillips, with an address of 932 Goodwyn Circle, Apt D, Montgomery, AL 36108. I recognize the photograph associated with the identification as being a picture of Crystal Phillips.

Based on the facts set forth above, I believe there is probable cause that Crystal Phillips cashed the \$2,000.00 U.S. Treasury check and stole the funds from FEMA.


Terry C. Crump, Special Agent in Charge
Dept. Of Homeland Security-OIG

Subscribed and sworn to
before me this 17th day
of March, 2006.


United States Magistrate Judge